

ABERDEEN CITY COUNCIL

COMMITTEE	Communities, Housing and Public Protection Committee
DATE	26 August 2025
EXEMPT	No
CONFIDENTIAL	No
REPORT TITLE	Annual Assurance Statement
REPORT NUMBER	F&C/25/186
DIRECTOR	Eleanor Sheppard
CHIEF OFFICER	Jacqui McKenzie
REPORT AUTHOR	Martin Smith
TERMS OF REFERENCE	1.1.1

1. PURPOSE OF REPORT

- 1.1 To seek approval for the Council's Annual Assurance Statement for the year 2025/26, which must be submitted to the Scottish Housing Regulator by 31 October 2025.

2. RECOMMENDATION

That the Committee: -

- 2.1 Approve the Annual Assurance Statement (Appendix A) for submission to the Scottish Housing Regulator by 31 October 2025;
- 2.2 Note the self-assessment against regulatory standards contained in Appendix B; and
- 2.3 Note the work undertaken to address areas listed in the Housing Regulator Engagement Plan (April 2025) to date.

3. BACKGROUND

- 3.1 The Scottish Housing Regulator (SHR) has an established Regulatory Framework relating to housing services' performance. The Regulatory Framework includes the need for social landlords to:
- Submit an Annual Return against the Charter (ARC) in May of each year.
 - Publish an Annual Assurance Statement (AAS) by the end of October of each year and make it available to tenants and other service users.
 - Notify the Regulator of any material changes to the assurance in its Annual Assurance Statement.
 - Undertake a Tenant Satisfaction Survey at least every three years.
- 3.2 The SHR wrote to Aberdeen City Council on 31 March 2025 to advise that engagement activity for 2025/26 would focus on the following key areas:

- Services for people who are homeless
- Gypsy/Travellers Site
- Service quality
- Stock quality
- Tenant and Resident Safety.

3.3 In addition, the Regulator has been informed of our identification of reinforced autoclaved aerated concrete (RAAC) in some of our homes, and we have kept the Regulator updated on our plan to manage any associated risks. In the 2025/26 engagement plan, the Regulator is therefore seeking assurance that Aberdeen City Council is progressing with this plan.

How the Regulator Gains Assurance

- 3.4 Under the Housing (Scotland) Act 2010 the Scottish Housing Regulator is responsible for monitoring, assessing, and reporting on how well social landlords, individually and collectively, achieve the Charter's outcomes. In May of each year, Scottish social landlords are required to report on a suite of performance measures through the Annual Return on the Charter (ARC). The ARC provides information across standard core housing service performance indicators, contextual information and data gathered from tenant surveys. Completion of the ARC supports the Housing cluster to self-evaluate its own effectiveness and compliance and therefore identify areas for improvement.
- 3.5 The Regulator requires all social landlords to prepare and publish an Annual Assurance Statement (AAS) to confirm to tenants and the Regulator that they are meeting their statutory requirements and how well they are delivering against the Scottish Social Housing Charter (which essentially sets the standards and outcomes that all social landlords should aim to achieve when performing their housing activities) by October of each year. The AAS provides assurance that a robust system of governance is in place and helps the Regulator determine if there is a culture of continuous assurance and improvement.
- 3.6 Material changes reported by social landlords to the Regulator out with the established framework, such as Aberdeen City Council reporting of the identification of RAAC in properties, are assessed by the Regulator on a case-by-case basis.
- 3.7 Any areas of non-compliance reported are subject to ongoing engagement between the Regulator and the Social Landlord until the risk is reduced or removed.
- 3.8 Having reviewed all information available to them, the Regulator proportionately engages with different landlords depending on their risk and performance profile. The Regulator publishes individual Engagement Plans by April of each year to share the areas they wish to engage with social landlords on. This year, based on returns submitted over 2024, the Regulator's [Engagement Plan](#) for Aberdeen City Council has identified the areas outlined in section 3.2.
- 3.9 The draft Annual Assurance Statement can be found at Appendix A and is supported by a self-assessment of compliance to inform the Annual Assurance Statement for 2024/25 (Appendix B). Undertaking this process has helped validate

the need to continue to focus on the areas contained in the Regulator Engagement Plan and captured in the agile Housing Board Plan. An update on progress towards the areas for improvement published in the Regulator Engagement Plan is provided below.

Regulator Engagement – Homelessness

- 3.10 [National homelessness data](#) for 2023/24, published in late September 2024, has been analysed to understand the Council's position relative to other local authorities, other cities and the overall national mean. The presenting figures for Aberdeen City paint a mixed picture, yet the overall mid-term trends broadly mirror what is happening nationally, particularly in terms of increases in new and existing demands. There were however, encouraging signs that applicant demands began to plateau in 2023/24, yet do still remain high. The Housing Board have quality assured the report and accepted the recommendations which have been aligned with current workplans.
- 3.11 There was a 1.9% decrease in homeless applications, falling from 1,780 in 2023/24 to 1,747 in 2024/25. However, despite this reduction, demand for rehousing rose by 11% (+137), with the number of households assessed as unintentionally homeless increasing from 1,239 to 1,376 over the same period. This rise continues to place additional pressure on housing stock across the city. Homeless applications have soared again during Q1 this year (2025/26) with 542 having been received, up 21% (+94) when compared with Q1 2024/25 and the highest levels seen since 2010/11.
- 3.12 A change in the demand profile for temporary accommodation, with 67.3% households provided with temporary accommodation in 2024/25 compared with 61.8% in 2023/24, has meant that despite a reduction in overall applications, service demand has grown. The number of homeless applications has fallen slightly but the percentage of homeless applicants requiring temporary accommodation has increased within the cohort. So despite the number of applications dropping, the demand for temporary accommodation has actually increased.
- 3.13 Renewed focus on securing decisions and outcomes more quickly for people in our homeless system has resulted in a 9.3 day reduction in the decision time for homeless applicants (39.4 to 30.1 days) with 58% of applicants being assessed within the 28 days target, a 13% increase on 2023/24. This, alongside an overall increase in the percentage of offers to homeless applicants from 34% to 38.5%, has contributed to the average homeless journey reducing by 28 days to 134 days when compared to 163 days in 2023/24.
- 3.14 A primary area of focus has been on reducing our use of unsuitable hotel accommodation. To this end, an additional 128 furnished temporary flats were added to temporary accommodation stock. Despite this, 427 breaches of the Homeless Persons (Unsuitable Accommodation) (Scotland) Order were recorded in 2024/25, which is a significant number, but a 20% reduction on the same figure in 2023/24. Year end figures showed hotel occupancy rates reduced by 81% (from 118 down to 23 rooms occupied) but this appears to have been a fleeting low, with unsuitable accommodation placements rising in the first quarter of 2025/26, albeit to a significantly lower level than the highs of 2023/24. This remains an area of focus.

- 3.15 Progress towards the overall objective of reaching a position where hotels are not being used to supplement our temporary accommodation stock can be demonstrated by 96% of temporary accommodation assuring compliance with the order at year end, a 17% increase on the same percentage in 2023/24.
- 3.16 The Homewards Coalition continues to have a strong focus on preventing homelessness for single adults experiencing relationship breakdown and young people in the city. Most recently, Invisible Cities was launched in Aberdeen in conjunction with Homewards, which provides an opportunity for people who have experienced homelessness to receive training and skills to become a tour guide in the city. In addition, furnishings have been provided to households through the innovative housing programme to support tenancy sustainment in partnership with Langstane Housing Association.

Regulator Engagement- Gypsy/Traveller Site

- 3.17 In February 2024, the Gypsy/Traveller site at Clinterty was re-opened following closure for extensive development and is now fully compliant with [Scottish Minimum Site Standards](#) as required by the Scottish Housing Regulator. The site has undergone significant improvements, which have enhanced living conditions for the Gypsy/Traveller community. These include enhanced sustainability and improved site layout. A number of third sector and support groups are active at the site resulting in continued satisfaction with the Clinterty Site. As outlined in the 2025/26 engagement plan, dialogue will continue with the Regulator on the management of the site and provide further information and assurance as required.

Regulator Engagement – Service Quality

Service Quality – Tenant Satisfaction

- 3.18 The Council undertook a tenant satisfaction survey in April/May 2024. The statutory survey which is to be completed every three years was administered digitally for the first time, and the Housing & Support Officers put in place a range of mechanisms to mitigate against a lack of digital access or capacity to respond. Despite these mitigations, there was a far lower response rate and less positive responses than previous three-year surveys administered.
- 3.19 Due to the low response rate for the tenant satisfaction survey that was undertaken in 2024, the Council will undertake a further tenant satisfaction survey in 2025 using an independent external contractor to conduct the survey face to face and via telephone. This provider is currently being procured. Results will be available in October 2025 to help inform the rent setting process.

Service Quality – Voids Management

- 3.20 One of the most notable improvements has been in the reduction of housing voids. The number of housing voids has decreased from 2,270 in July 2024 to 1,852 at the end of March 2025, representing a reduction of 418 voids. Furthermore, there has been a 28.60% reduction in the number of buybacks sitting as voids, from 231 in July

2024 to 197 at the end of March 2025. The number of buybacks currently stands at 165, showcasing a continued effort to minimize voids. Relets have also seen a significant increase, with a 19.5% rise in relets over 2024/25 compared to 2023/24. Specifically, there were 2,536 relets in 2024/25, compared to 2,123 in the previous year. The effectiveness of these improvements will be evaluated based on their impact on housing availability and tenant satisfaction. In addition to this the operational teams involved in the process are examining ways in which we can reduce the key stages within the void path and gateways. The Housing Board and Communities, Housing & Public Protection Committee will continue to provide oversight and scrutiny of this core business objective.

Service Quality- Rent Arrears

- 3.21 The percentage of rent arrears for 2024/25 was 17.86% which was a slight decrease from 18.25% in 2023/24.
- 3.22 Cost-of-living crisis and increase in fuel costs have both had a negative impact on tenants' incomes. Although we previously had a focus on avoiding legal actions, including evictions, we've reinstated that recovery process. Using digital case conferencing, we are ensuring all possible options have been attempted and exhausted before we take this action.
- 3.23 Universal Credit continues to have an impact on rent recovered with the number of tenants claiming this benefit increasing. Universal Credit migration for legacy benefits cases started in September 2024.
- 3.24 Escalation policies have been further developed with collaborative working approaches between the Corporate Debt and Housing Teams. A review of the Former Tenancy Process has been concluded by benchmarking with other local authorities and via the Rent Forum. The revised process has been implemented. A revised process for tenants with small balances outstanding has been developed and implemented. A Rent Assistance Fund has been introduced to help support tenants stay in their home.
- 3.25 Going forward into 2025/26, work is ongoing to continue to review and introduce new initiatives surrounding all rent escalation policies with the aim of reducing rent arrears. A revised target of 9.5% has been set, aligned with the Scottish average.

Service Quality – Tenancy Sustainment

- 3.26 Tenancy sustainment has shown a slight improvement, rising from 89.33% in 2023/24 to 90.26% in 2024/25. This increase, although modest, reflects efforts to support tenants in maintaining their tenancies and reducing the risk of homelessness.
- 3.27 Further to the Housing and Support Officer focus groups held last year, staff were surveyed to help prioritise actions around the housing and support model. Drawing on the insight gained from this staff feedback, we have prioritised key areas for improvement and initiated targeted tests of change. These efforts ensure that valuable ideas from teams directly inform the development and implementation of

service enhancements across patch teams, which plays a crucial role in strengthening our ability to support tenancy sustainment.

- 3.28 A recent test of change in one locality involved simplifying the recording of housing support cases. A Senior Housing & Support Officer created a staff feedback form to assess current recording methods and the number of tenancies receiving ongoing support. The feedback was reviewed by Senior Housing & Support Officers and the Service Standard Officer, leading to updated processes, guidance, and system changes aimed at improving case recording. Additionally, a review of support cases with Turning Point Scotland is underway through regular meetings between relevant staff.

Regulator Engagement – Stock Quality

- 3.29 Feedback from tenants suggests there is a clear link between the level of tenant satisfaction, and the age of home. The complexity of repairs required to properties, influenced by the age and profile of our stock, impacts on the time taken to complete repairs or that a building remains void. Whilst the number of repairs completed have reduced, the time and cost of repairs has increased. Work is currently progressing on the development of an Asset Management Model. A comprehensive Asset Management Model will enable evidence-based decision making around which properties should be prioritised for investment. Investment in homes continues, as evidenced by SHQS (Scottish Housing Quality Standard) compliance, although we've seen a slight decrease in 2024/25 to 88.63% but indications projecting that we will return to 91.80% by the end of the reporting year.
- 3.30 Collaborative work with the Aberdeen City Health and Social Care Partnership has realised improvements in arrangements to adapt properties resulting in 1,051 adaptations completed on properties in 2024/25, an increase on the 946 in the previous year.

Regulator Engagement – Tenant and Resident Safety

- 3.31 Our Engagement Plan with the Regulator outlines our commitment to submit a comprehensive plan detailing the timescales for completing all outstanding electrical safety work, as well as mechanisms for maintaining future compliance. This plan has already been forwarded to the Regulator.
- 3.32 A dedicated team is being established to focus exclusively on electrical compliance with recruitment currently being progressed. This team will collaborate with Housing and Support Officers to improve property access and ensure timely completion of necessary work. In addition, a new arranged access procedure modelled on the successful gas compliance process was approved at Communities, Housing and Public Protection Committee in May to further streamline these efforts.
- 3.33 Despite ongoing challenges in accessing certain properties, we have revised our processes to improve entry rates. The Electrical Installation Condition Report (EICR) for 2024/25 indicates that 3,023 properties (12.8%) remain non-compliant. The actions outlined above are intended to directly address these challenges and ensure continuous improvement in our compliance and safety standards.

Regulator Engagement – RAAC

- 3.34 Aberdeen City Council identified RAAC in 504 homes (372 buildings) across the Balnagask estate. Of these properties, 366 are owned by Aberdeen City Council and 138 are in private ownership. Based on independent technical engineering assessments, the Council determined the need to urgently rehome the residents of these properties to address the very high safety risks posed by the RAAC panels used in the construction of the roofs.
- 3.35 The Regulator's primary focus during this process has been to ensure the effectiveness and thoroughness of the rehoming programme, prioritising the safety and wellbeing of all tenants affected. The Council took proactive steps to safeguard residents, maintaining regular engagement with the regulator to provide assurance of the actions implemented and the effectiveness of the rehoming strategy. As a result of these coordinated efforts, the majority of tenants have been successfully rehomed, and the last remaining tenants are continuing to be supported through tailored assistance and ongoing engagement.

Securing Continuous Improvement

- 3.36 The Housing Board has embedded a culture of continuous improvement at the core of its approach, ensuring that progress in housing outcomes is not only tracked, but also actively enhanced through agile and data-driven methods. Regular review of its High-Level Plan allows the Board to remain responsive to emerging vulnerabilities, adapting priorities as necessary based on performance data and ongoing evaluation. This iterative, test-and-learn approach has allowed the Housing Board to deepen its understanding of complex issues and to support the development of interventions that are both evidence-based and impactful.
- 3.37 Key to the Housing Board's success has been the development and utilisation of a comprehensive Housing Board Data Dashboard, which is updated weekly and formally reviewed monthly. This dashboard provides real-time insights for operational teams and offers a robust foundation for assessing the impact of new initiatives. As a result, significant improvements have been realised, including notable reductions in housing voids, increased relets, declining abandonment rates, improved tenancy sustainment, and a reduction in gross rent arrears. The Board's commitment to data-led action has also led to improvements in homelessness services, with applications, journey times, and use of temporary accommodation all significantly reduced.
- 3.38 Continuous refinement of the dashboard ensures that it remains fit for purpose, incorporating new metrics as the Board's quality improvement agenda evolves. The adoption of advanced systems like NEC further enhances oversight, particularly in repairs and maintenance.

3.39 In parallel with its ongoing drive for quality, the Housing Board also exercises oversight of the housing emergency action plan. This plan, designed to address urgent housing challenges, is under active review by the Board to ensure it remains effective, relevant, and aligned with current needs. The Board is currently undertaking a review of the plan, which will be presented to the Communities, Housing and Public Protection Committee in November. This structured approach to oversight ensures that the Board can demonstrate accountability, transparency, and a relentless focus on delivering better outcomes for the community in the face of the housing emergency.

Quality Improvement Framework

3.40 The Quality Improvement Framework (QIF) was approved by Communities, Housing & Public Protection Committee in May 2025, evidencing the council's commitment to ongoing improvement in housing provision. It serves as a structured approach to systematically evaluate, monitor, and enhance the delivery of housing services. Its core purpose is to ensure that the highest standards of service are consistently met, while proactively identifying areas for development and innovation. By embedding robust data analysis, regular performance reviews, and stakeholder engagement into routine practice, the QIF strengthens assurance. This framework underpins the Council's ability to meet statutory requirements, such as the Annual Assurance Statements, and fosters a culture of transparency and accountability. Through regular review and targeted action, it will drive continuous improvement, ensuring the housing service evolves to meet emerging needs and challenges.

4. FINANCIAL IMPLICATIONS

There are no direct financial implications arising from the recommendations of this report.

5. LEGAL IMPLICATIONS

The requirement for Annual Assurance Statements is set out in statutory guidance issued by the Scottish Housing Regulator under the Housing (Scotland) Act 2010. The recommendations of this report will enable the Council to comply with that requirement.

6. ENVIROMENTAL IMPLICATIONS

There are no direct environmental implications arising from the recommendations of this report.

7. RISK

Category	Risks	Primary Controls/Control Actions to achieve Target Risk Level	*Target Risk Level (L, M or H) *taking into account controls/control actions	*Does Target Risk Level Match Appetite Set?
Strategic Risk	There is a risk that we do not effectively discharge our duties as a social landlord	This risk is mitigated by undertaking regular self-evaluation/assessments to identify areas of the charter we should focus on to secure continuous improvement.	L	Yes
Compliance	If the Council does not submit the Annual Assurance Statement by 31st October 2025, the Council will not meet regulatory requirements, the Council must comply with the law.	This risk is mitigated by seeking approval for the Annual Assurance Statement and submitting it to the Regulator within stipulated timescales. Regular self-assessment and monitoring against the regulatory requirements helps the service identify areas of vulnerability that can be prioritised for improvement. The establishment of stronger data architecture will support this area further.	L	Yes
Operational	There is a risk that the service does not work to the Scottish Social Housing Charter	This risk is mitigated by undertaking regular self-evaluation against the Charter to identify where further focus is required to help shape operational delivery.	L	Yes
Financial	There are risks that the Council cannot demonstrate 'best value'	This has been mitigated by identifying the need for an Asset Management Plan to help guide our decision making around long-term investment in our housing stock and by evaluating the impact of the Housing and Support Model to inform next steps.	L	Yes

Reputational	There is a risk that we do not perform well as a social landlord.	Regular self-evaluation is helping the service to identify areas for improvement based on a robust evidence base. In collaboration with tenants, this is helping the service identify the priorities for improvement.	L	Yes
Environment / Climate	There are no significant risks identified			Yes

8. OUTCOMES

<u>COUNCIL DELIVERY PLAN</u>	
	Impact of Report
Aberdeen City Council Policy Statement	<p>A number of areas within 'Homes for the Future' will be positively impacted by this report. Of particular impact on the policy statement are:</p> <ul style="list-style-type: none"> • The development of an Asset Management Plan • The number of adaptations made to homes • Work to realise net zero targets • Increasing choice for tenants
Aberdeen City Local Outcome Improvement Plan	Stretch Outcome 12 aims to 'Reduce homelessness by 10% and youth homelessness by 6% by 2026, ensuring it is rare, brief and non-recurring with a longer-term ambition to end homelessness in Aberdeen City'.
Regional and City Strategies	Data gathered as part of self-evaluation has helped inform the development of our Aberdeen City Local Housing Strategy.
UK and Scottish Legislative and Policy Programmes	This report ensures that we are compliant with the regulatory requirements set out by the Scottish Housing Regulator.

9. IMPACT ASSESSMENTS

Assessment	Outcome
Impact Assessment	No assessment required at this stage. I confirm this has been discussed and agreed with Jacqui McKenzie, Chief Officer Housing on 21 July 2025.
Data Protection Impact Assessment	Not required
Other	None

10. BACKGROUND PAPERS

Scottish Housing Regulator – Regulation of Social Housing in Scotland
Scottish Housing Regulator – Statutory Guidance
Scottish Housing Regulator – Annual Assurance Statement

11. APPENDICES

A - Draft Annual Assurance Statement
B - Self-Assessment of Compliance against Regulatory Framework

12. REPORT AUTHOR CONTACT DETAILS

Name	Martin Smith
Title	Locality Inclusion Manager
Email Address	martinsmith@aberdeencity.gov.uk
Tel	01224 067423

Appendix A



Aberdeen City Council complies with the regulatory requirements set out in Chapter 3 of the Regulatory Framework, and have obtained appropriate assurance on compliance with all relevant safety requirements with the following exceptions:

- Services for people who are homeless/the provision of unsuitable accommodation - (as defined by Article 5 of the Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014 has been breached on 427 occasions during financial year 2024/25. In achieving this 20% improvement from last year, we will continue to support the implementation of the improvement charters aligned to the Homewards programme and continue to support the implementation of the established Reducing Hotel Use Action Plan to reduce the use of temporary accommodation.
- Tenant & Resident Safety (partially compliant) - We recognise that Tenant and Resident Safety is of utmost importance and acknowledge that we did not hold a valid Electrical Installation Condition Report (EICR) certificate for 1625 properties as at 31 March 2025. We will continue with the actions that are in place to address all overdue cases and continue to engage with the Regulator on progress.

Following a robust assessment against the Scottish Social Housing Charter for tenants, people who are homeless and others who use our services, we have identified areas for continuous improvement and have appropriate plans in place:

The customer/landlord relationship:

- After acknowledging feedback from our staff and completing an evaluation of the Housing & Support model, we will carry out Tests of Change to ensure that we increase the number of registered housing support cases, ensuring that our most vulnerable tenants receive the intervention and support they require.
- Having worked with our tenant groups, we plan to carry out a refreshed statutory tenant satisfaction survey in autumn 2025, where we hope to increase the returns which we can then use to enhance and improve our housing services.
- Using the recently approved Tenant Participation Action Plan, we plan to continue to work with tenants to amplify their voices and opportunities for participation.

Housing quality and maintenance:

- We plan to continue developing and then publish an Asset Management Plan to determine how best to ensure adequate provision of appropriate housing stock that meets all building quality standards.
- We will be continuing our work to increase the number of completed EICRs and properties meeting SHQS.
- Having streamlined accountability for voids, we will now work to reduce them further. We will continue to explore new ways of working to ensure that we minimise the average relet time and to increase our letting.

Neighbourhood and community:

- We will implement a digital system by April 2026, linked with the current housing system, to help improve communication with tenants on when repairs will be completed.
- We will collaborate with colleagues in social work and Violence against Women and Girls Partnership to ensure that those who have been the victims of domestic violence are well supported.

Access to housing and support:

- Having completed our evaluation of the Housing & Support model, we will continue to develop Test of Change ideas to ensure our tenants have the necessary support to enable them to sustain their tenancies.
- We will continue to work with The Royal Foundation Homewards programme to help prevent homelessness and improve services for the homeless.
- We will continue to keep the criteria for our Rent Assistance fund under review.

Getting good value from rent and service charges:

- We will take decisions on our housing stock following publication of an Asset Management Plan.
- We will continue to implement our approved Improvement Project to help address rent arrears and reverse the trend.

We will continue to engage with the Regulator as we support the last remaining tenants, as part of the rehoming programme, for those impacted by RAAC.

I confirm Aberdeen City Council has seen and considered appropriate evidence in approving this Annual Assurance Statement at our Communities, Housing and Public Protection Committee on 26 August 2025.

Councillor Miranda Radley
Convener – Communities, Housing and Public Protection Committee
Aberdeen City Council